

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No: 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>  <b>All Wave II TVT Cases</b>  <b>All Wave II TVT-O Cases</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANY  
DAUBERT MOTION RELATED TO LARRY T. SIRLS, II, M.D.**

Plaintiff respectfully moves this Court for an order granting a ten (10) day extension of the filing *Daubert* Motion from the date of deposition. This is Plaintiff's first request for an extension of time for this deadline. This extension is not sought for reason of delay or for any other improper purpose. Counsel for Defendant has stated that they do not oppose the requested extension.

Due to scheduling difficulties, the deposition of Ethicon's expert Dr. Larry Sirls is scheduled for Thursday, July 21, 2016. Plaintiff respectfully moves the Court for an order extending the filing deadline for any *Daubert* briefing regarding Dr. Sirls until August 1, 2016 or by ten (10) days from the date of deposition if it is not, in fact, completed on July 21, 2016 as currently scheduled.

WHEREFORE, Plaintiff requests that the Court grant the requested ten (10) day extension from the date of deposition, moving the due date for Plaintiff's Motion to Limit the

Case Specific Opinions Offered by Larry T. Sirls, II, M.D. to August 1, 2016 and Defendants'  
Case-Specific *Daubert* Motions reply deadline to August 11, 2016.

Dated: July 18, 2016

Respectfully submitted,

/s/ Fidelma L. Fitzpatrick  
FIDELMA L. FITZPATRICK  
Motley Rice LLC  
321 S. Main St., 2<sup>nd</sup> Floor  
Providence, RI 02903  
Phone: (401) 457-7700  
Fax: (401) 457-7708  
[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)

FRED THOMPSON, III  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Phone: (843) 216-9000  
Fax: (843) 216-9450  
[ftompson@motlerice.com](mailto:ftompson@motlerice.com)

**Plaintiff's Counsel**

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Fidelma L. Fitzpatrick

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**[PROPOSED] ORDER**

AND NOW, this \_\_\_\_\_ day of July, 2016, upon consideration of Plaintiff's Unopposed Motion to File Any *Daubert* Motion Related to Larry T. Sirls, II, M.D. in the above matter, it is hereby ORDERED that Plaintiff's Motion is GRANTED. Plaintiff's *Daubert* Motion is due by **August 1, 2016** and Defendants' Case-Specific *Daubert* Motions reply deadline to **August 11, 2016**.

**IT IS SO ORDERED.**

**BY THE COURT:**

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**JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE**